

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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**CLEMENT WOGHIREN,**

**Plaintiff,**

**v.**

**WYETH, and  
WYETH BIOPHARMA,**

**Defendants.**

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**CIVIL ACTION NO. 04-12148 WGY**

**AFFIDAVIT OF CLEMENT WOGHIREN IN SUPPORT OF  
OPPOSITION TO DEFENDANTS' MOTION FOR COSTS**

1. My name is Dr. Clement Woghiren and I am an adult Georgia resident.
2. I am the plaintiff in the above-captioned matter.
3. I was unemployed from the date of my termination from Wyeth effective September 24, 2004 until the date of the commencement of my current position with Inibitex in Georgia on June 1, 2005.
4. During the 35 week period of my unemployment I received approximately \$400 per week in unemployment insurance payments.
5. In order to support myself, my young son who lives with his mother in New Jersey and my family in Nigeria, I depleted my savings and took out a home equity loan on a home I owned and in which I formerly resided in North Andover, Massachusetts.
6. As a result, there was no equity in the home, which made selling the home difficult in the current housing market. I recently sold the house at a substantial loss.
7. I have incurred substantial fees and costs in litigating this case, which I litigated in good faith.

8. I simply do not have the financial means to pay additional substantial costs relating to this litigation. The award of even a portion of Wyeth's costs would cause a severe financial hardship to me and my family.

**SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 2<sup>ND</sup> DAY  
OF FEBRUARY, 2006.**

/S/ Clement Woghiren  
Clement Woghiren